

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

Consumer Financial Protection Bureau,

Plaintiff,

v.

Craig Manseth, Jacob Adamo, Darren Turco, United Debt Holding LLC, JTM Capital Management, LLC, UHG, LLC, UHG I LLC (also known as United Holding Group), and UHG II LLC (collectively holding themselves out as United Holding Group, United Holding Group, LLC, and United Holdings Group, LLC),

Defendants.

Case No. 1:22-cv-00029-LJV

**PLAINTIFF'S NOTICE OF SUPPLEMENTAL AUTHORITIES**

Plaintiff Consumer Financial Protection Bureau (Bureau) provides this notice to the Court of three recent decisions in ongoing Bureau enforcement actions relevant to the Court's resolution of Defendants' motion to stay pending the Supreme Court's decision on the constitutionality of the Bureau's statutory funding mechanism in *CFPB v. Community Financial Services Association of America, Ltd.*, No 22-448 (oral argument held Oct. 3, 2023) ("CFSAs"), ECF No. 61.<sup>1</sup>

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<sup>1</sup> This group does not include stay orders in summary proceedings to resolve Bureau petitions to enforce civil investigative demands, a form of administrative subpoena. *See Order, CFPB v. Cmty. Loans of Am., Inc.*, No. 1:23-mi-00100-SEG-RGV (N.D. Ga. Jan. 2, 2024), ECF No. 15; *Order, CFPB v. Purpose Financial Inc.*, No. 7:23-mc-00406-DCC (D.S.C. Dec. 29, 2023), ECF No. 28; *Order, CFPB v. Check City Partnership, LLC*, No. 2:23-cv-00939-JCM-EJY (D. Nev. Nov. 3, 2023), ECF No. 23. Although several courts have recently stayed such proceedings, their decisions are all distinguishable. Given the summary nature of those proceedings, the courts there would have needed to resolve the constitutional question pending before the Supreme Court for the litigation to move forward.

*First*, on January 12, 2024, a judge in the Southern District of Florida issued a written order refusing to stay a Bureau enforcement action pending the Supreme Court’s decision in *CFSAs*. *See Ex. A at 2* (Order, *CFPB v. Freedom Mortg. Corp.*, No. 9:23-cv-81373-DMM (S.D. Fla. Jan. 12, 2024), ECF No. 25) (reasoning that the Bureau “remains a valid agency that is entitled to enforce the consumer protection laws” and that a stay would undermine the public’s “strong interest in vigorous enforcement of consumer protection laws”).

*Second*, on December 22, 2023, a judge in the District of Massachusetts summarily denied the defendants’ third motion to stay the Bureau’s case against them. *See Ex. B* (Order, *CFPB v. Commonwealth Equity Grp., LLC*, No. 1:20-cv-10991 (D. Mass. Dec. 22, 2023), ECF No. 142) (summarily denying defendants’ renewed stay motion after transfer to new district judge).

*Third*, on December 1, 2023, a judge in the Southern District of New York granted the defendants’ motion to stay the litigation pending the Supreme Court’s decision in *CFSAs*. *See Ex. C* (Order, *CFPB v. MoneyLion Techs.*, No. 1:22-cv-08308-JPC (S.D.N.Y. Dec. 1, 2023), ECF No. 80) (granting motion to stay after finding that interests of defendants and court weighed in favor of stay).

Dated: January 17, 2024

Respectfully submitted,

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